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April 08, 2025

**VIA ECF**

Hon. Gary R. Brown, USDJ  
United States District Court Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11717

Re: *Barahona et al v Paradise Tree Service & Landscape, Corp et al,*  
Case No. 21-cv-05400 (GRB)(LGD)

Dear Judge Brown:

I represent the Plaintiffs in the above-mentioned matter. Please accept this status report regarding the settlement negotiations between the parties.

The parties have been unable to reach a settlement. However, all parties consent to a bench trial.

Respectfully submitted,

*Steven J. Moser*  
Steven J. Moser

CC: William Nieto (via email)